

EXHIBIT 64

Page 1

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION

CASE NUMBER
7:19-cv-00403-RDP

ADAM JONES and JOSHUA HASTINGS,
Plaintiff(s),
vs.
BUZZFEED, INC., BUZZFEED NEWS, BEN SMITH,
and KATIE J.M. BAKER,
Defendant(s).

VIDEO AND ZOOM DEPOSITION TESTIMONY OF:
TERRY CARROLL

JANUARY 19, 2021
12:02 p.m.
COURT REPORTER:
NANCY W. PANNELL, CCR
The reading and signing of this deposition
has NOT been waived

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1 TERRY CARROLL
2 INSTRUCTIONS TO THE WITNESS
3
4 Please read your deposition
5 over carefully before you sign it. You
6 should make all your changes on the
7 attached errata sheet.
8 After making any changes
9 which you have noted on the attached
10 errata sheet, sign your name on the
11 Deponent's Certificate and date it. You
12 are signing it subject to the changes you
13 have made on the errata sheet, which will
14 be attached to the deposition.
15 Return the attached errata
16 sheet and Deponent's Certificate to
17 Birmingham Reporting, 3710 4th Avenue
18 South, Birmingham, Alabama 35222.
19 According to the Rules of
20 Civil Procedure, you will have thirty (30)
21 days from the date you receive this
22 deposition in which to read it, sign it,
23 and return the errata sheet and Deponent's

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1 Certificate to the above office. If you
2 fail to do so, you automatically waive
3 your right to make any corrections to your
4 deposition.
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1 ERRATA SHEET
2 PAGE LINE EXPLANATION
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1 DEPONENT'S CERTIFICATE

2

3 I, TERRY CARROLL, the

4 witness herein, have read the transcript

5 of my testimony and the same is true and

6 correct, to the best of my knowledge. Any

7 corrections and/or additions, if any, are

8 listed separately.

9

10 _____

11 TERRY CARROLL

12

13 _____

14 DATE

15

16 Sworn to and subscribed

17 before me, this the ____ day of

18 _____, 2021, to certify my hand

19 and seal of office.

20

21

22 _____

23 NOTARY PUBLIC

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1 S T I P U L A T I O N

2 IT IS STIPULATED AND AGREED

3 by and between the parties through their

4 respective counsel that the VIDEO AND ZOOM

5 DEPOSITION of TERRY CARROLL may be taken

6 before Nancy W. Pannell, Certified

7 Shorthand Reporter and Notary Public,

8 State at Large, at the offices of

9 Birmingham Reporting Service, WorkSouth

10 Tuscaloosa, 1490 Northbank Parkway, Suite

11 200, Conference Room 252, Tuscaloosa,

12 Alabama, on JANUARY 19, 2021, commencing

13 at approximately 12:02 p.m.

14 IT IS FURTHER STIPULATED AND

15 AGREED that the signature to and the

16 reading of the deposition by the witness

17 IS NOT waived, the deposition to have the

18 same force and effect as if full

19 compliance had been had with all laws and

20 rules of Court relating to the taking of

21 depositions.

22 IT IS FURTHER STIPULATED AND

23 AGREED that it shall not be necessary for

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1 any objections to be made by counsel to

2 any questions, except as to form or

3 leading questions, and that counsel for

4 the parties may make objections and assign

5 grounds at the time of trial or at the

6 time said deposition is offered in

7 evidence, or prior thereto.

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1 I N D E X

2

3 EXAMINATION BY: PAGE NO.

4 MS. BOLGER 13

5 CERTIFICATE 68

6

7

8 INDEX OF EXHIBITS

9

10 PREVIOUSLY MARKED DEFENDANT'S EXHIBITS

11 REFERENCED AND ATTACHED

12 2 Homicide Unity Felony 43

13 Packet

14 16 Timeline of Rondini Case, 19

15 Page 1-146

16

17

18 DEFENDANT'S EXHIBITS: PAGE NO.

19 43 Police Interview of TJ Bunn 35

20 44 Police Interview of Jason 52

21 Barksdale

22

23

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A P P E A R A N C E S

FOR THE PLAINTIFF(S):

MR. BOBBY H. COCKRELL, JR.
 MR. G. SCOTCH RITCHEY, JR.
 COCKRELL, COCKRELL, TOWNSEND &
 RITCHEY, LLP
 1409 UNIVERSITY BOULEVARD
 TUSCALOOSA, ALABAMA 35401

FOR THE DEFENDANT(S): (Via Zoom)

MS. KATHERINE M. BOLGER
 DAVIS, WRIGHT, TREMAINE, LLP
 1251 AVENUE OF THE AMERICAS
 21ST FLOOR
 NEW YORK, NEW YORK, 10020-1104

FOR THE WITNESS TERRY CARROLL:

MR. JOEL E. DILLARD
 DILLARD, MCKNIGHT, JAMES
 & MCELROY, LLP
 2700 US-280
 SUITE 110 EAST

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BIRMINGHAM, ALABAMA 35223

ALSO PRESENT:

Allen Eaves, videographer

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I, Nancy W. Pannell, a
 Certified Shorthand Reporter of
 Birmingham, Alabama, and a Notary Public
 for the State of Alabama at Large, acting
 as Commissioner, certify that on this
 date, pursuant to the Federal Rules of
 Civil Procedure and the foregoing
 stipulation of counsel, there came before
 me at the offices of Birmingham Reporting
 Service, WorkSouth Tuscaloosa, 1490
 Northbank Parkway, Suite 200, Conference
 Room 252, Tuscaloosa, Alabama, commencing
 at approximately 12:02 p.m. on JANUARY 19,
 2021, TERRY CARROLL, witness in the above
 cause, for oral examination, whereupon the
 following proceedings were had:

VIDEOGRAPHER: We are now on
 the record. This is the video deposition
 of Terry Carroll, Case Number
 7:19-cv-00403-RDP in the United States
 District Court for the Northern District

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of Alabama Western Division.

Today's date is January
 19th, 2021. The time is 12:02 p.m.

Would counsel introduce
 yourself into the record, after which the
 court reporter will swear in the witness.
 MS. BOLGER: Good afternoon,
 everybody. Kate Bolger from Davis,
 Wright, Tremaine on behalf of the
 defendants.

MR. DILLARD: Joel Dillard
 for the deponent.

MR. COCKRELL: Bob Cockrell
 for the plaintiff.

MR. RITCHEY: Scotch Ritchey
 for the plaintiffs.

TERRY CARROLL,
 having been first duly sworn, was examined
 and testified as follows:

COURT REPORTER: Thank you.
 Usual stipulations?

MR. DILLARD: Yes, except he
 would like to read and sign.

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1 MR. COCKRELL: Yes.

2 EXAMINATION

3 BY MS. BOLGER:

4 Q. Hi there, Mr. Carroll, my name is

5 Kate Bolger, and I represent the

6 defendants in this action, as I said, and

7 I represent the defendants in this action,

8 as I said.

9 And I understand from a newspaper

10 article that you are retired, so is it

11 okay if I call you Mr. Carroll rather than

12 investigator?

13 A. Oh, yeah, absolutely. I would

14 rather you did.

15 Q. Great. Well, thank you so much

16 for coming in today.

17 Have you ever been deposed before?

18 A. Yes.

19 Q. In what circumstance?

20 A. Couple of different cases that

21 I've worked in the past. One on a child

22 abuse and I can't remember what the other

23 one was, but yes.

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1 Q. Were any of those depositions

2 related to allegations made by or against

3 Megan Rondini?

4 A. Oh, no, no.

5 Q. Okay. Well, if you've done this

6 before, you probably know the rules, but

7 I'll go over them again.

8 It's a very strange process. I

9 ask questions. You give me answers.

10 Mr. Dillard or Mr. Cockrell can object at

11 any time. Unless Mr. Dillard tells you

12 not to answer, then you can go ahead and

13 answer the question.

14 I tend to talk pretty quickly and

15 I'm sorry about that. If I'm talking too

16 quickly, you can just go ahead and ask me

17 to slow down and I'll be happy to do that.

18 You should give your answers

19 orally because Nancy, already stretched

20 from having to take down what I say, needs

21 you to give a yes or no answer to put down

22 on the transcript.

23 And I don't want you to guess or

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1 speculate. I want to know your best

2 memory, and I don't know is a perfectly

3 acceptable answer.

4 Did you do anything to prepare for

5 today's deposition?

6 A. No.

7 Q. You didn't meet with Mr. Dillard

8 or anything?

9 A. Well, I did do that, yes, yes, but

10 other than that, no, sorry.

11 Q. For how long did you meet with

12 Mr. Dillard?

13 A. Probably for about 20, 25 minutes

14 at the most I think.

15 Q. Did you see any documents when you

16 met with Mr. Dillard?

17 A. No, I did not.

18 Q. Other than Mr. Dillard, have you

19 spoken to anybody else about your

20 testimony today?

21 A. No.

22 Q. Terrific. So I know, as I said

23 from a newspaper article, that you are

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1 relatively a recent retiree of the

2 Northport Police Department; is that

3 right?

4 A. That's correct, yes.

5 Q. And when did you retire?

6 A. I retired May of 2019.

7 Q. Do you currently work or are you

8 enjoying retirement?

9 A. I'm enjoying retirement, and I'm

10 working part time. I work at the

11 Tuscaloosa County Courthouse just doing

12 security there for about three days a

13 week, so.

14 Q. And at the time you retired from

15 the Northport Police Department how long

16 had you been there?

17 A. About 27, 28 years.

18 Q. Did you retire because 27,

19 28 years is a long time to be in the

20 police department or was there some other

21 reason?

22 A. No, I retired because I turned 60

23 and I just figured that when I found out I

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1 could retire at 60 and I had my time in, I
 2 figured it was time to go, so.
 3 Q. And during -- at some point during
 4 your time in the Northport Police
 5 Department you were assigned to the
 6 Tuscaloosa, what was once called the
 7 Tuscaloosa Homicide Unit and then became
 8 the Tuscaloosa Violent Crime Unit; right?
 9 A. That's correct, yes.
 10 Q. And when was that?
 11 A. I went in there I believe it was
 12 June of 2008 and came out sometime in 2018
 13 I think. I was in there about ten years.
 14 Q. And why did you leave the Homicide
 15 Unit?
 16 A. Well, I was getting closer to
 17 retirement and I didn't want my cases --
 18 to keep having to go to trial on cases and
 19 stuff so I kind of wanted them to
 20 hopefully filter out before I retired,
 21 that way I wouldn't have to come back to
 22 court.
 23 Q. Okay. And were you -- you were

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1 then in the Homicide Unit in July of 2015;
 2 right?
 3 A. Yes.
 4 Q. And what was your title there?
 5 A. I was an investigator.
 6 Q. And in 2015 you worked with Josh
 7 Hastings; right?
 8 A. Yeah, among several, yes.
 9 Q. And is he a friend of yours?
 10 A. He is, he is, yes.
 11 Q. He's quoted in that article about
 12 your retirement; right?
 13 A. He is.
 14 Q. And were you ever partners?
 15 A. We were partners.
 16 Q. When were you partners?
 17 A. That I don't remember because I
 18 had several different partners throughout
 19 my time, and I would be telling you wrong
 20 because I really don't have a clue on
 21 that.
 22 Q. Well, that's great. As I told
 23 you, I don't want you to speculate, so

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1 thank you very much for that.
 2 I'm going to ask Nancy, who is my
 3 hands in this deposition, to hand you the
 4 document that was marked as Exhibit 16 in
 5 a previous deposition, which is for Bob
 6 and Joel's point of view the production by
 7 the Tuscaloosa Sheriff's Office, the
 8 second production, and I'm going to ask
 9 you to turn to page 24 once you get it.
 10 (Whereupon, a document that was
 11 previously marked as Defendant's
 12 Exhibit No. 16 was referenced and
 13 is attached to the original
 14 transcript.)
 15 Q. So you should be looking at a
 16 document that says on the top Tuscaloosa
 17 Violent Crimes Unit Standard Operating
 18 Procedure Number One?
 19 A. Hang on. Okay.
 20 Q. Have you seen these standard
 21 operating procedures before?
 22 A. I haven't seen this particular one
 23 because it says Tuscaloosa Violent Crimes

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1 Unit. The one that I had was the
 2 Tuscaloosa County Homicide Unit.
 3 Q. Okay. If you want to take a look
 4 at the substance, in substance does it
 5 seem similar to what you had in the
 6 Homicide Unit?
 7 A. Yeah, it does.
 8 Q. And what was -- what is this
 9 document?
 10 A. This is just the SOP for the unit,
 11 you know, basically the procedures and
 12 everything that they go by when they --
 13 when we, you know, investigate crimes and
 14 things like that and how their unit is
 15 structured.
 16 Q. And when you were working at the
 17 Tuscaloosa Sheriff's Office in the violent
 18 crimes -- I'm sorry, you weren't at the
 19 sheriff's office, I apologize.
 20 When you were working in the
 21 Tuscaloosa Homicide Unit, had you reviewed
 22 these standard operating procedures?
 23 A. Yeah, I had read them before.

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1 MR. DILLARD: Sorry to
 2 interrupt, Kate, I'm going to try to hold
 3 it to a minimum. I think he said
 4 Northport, not Tuscaloosa.
 5 MS. BOLGER: Yeah, I
 6 corrected myself. But he was in the
 7 Tuscaloosa Homicide Unit.
 8 MR. DILLARD: Okay, I got
 9 you. Thank you.
 10 A. Yes, I had read them.
 11 Q. (By Ms. Bolger) Sorry, go ahead.
 12 A. No, I had read them before.
 13 Q. And you governed yourself
 14 according to these procedures?
 15 A. That's correct, yes.
 16 Q. When you were in the Homicide Unit
 17 did you have any training focused on
 18 investigating sexual assault allegations?
 19 A. Yes.
 20 Q. What training had you had?
 21 A. I really don't -- I honestly don't
 22 remember what all I had had. I had been
 23 to some schools, plus I did five years in

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1 the -- it was the Tuscaloosa Juvenile
 2 Division, which we investigated
 3 misdemeanor crimes, but we also
 4 investigated child abuse and sexual abuse
 5 of children.
 6 And I had some training in there
 7 as well, so -- but I couldn't tell you
 8 what specifically I had, so.
 9 Q. Okay. You used the word schools.
 10 What do you mean by schools?
 11 A. Well, when I say schools, I'm
 12 talking a three-day conference or a
 13 week-long conference or something like
 14 that.
 15 Q. And you had been to a school
 16 specifically about sexual assault
 17 investigations?
 18 A. Yes.
 19 Q. Do you remember anything about
 20 that?
 21 A. Not really, no.
 22 Q. How many times did you go to a
 23 school about sexual assaults?

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1 A. Oh, maybe once or twice, twice at
 2 probably the most. I'll be honest with
 3 you. I'm not absolutely sure on that.
 4 Q. Do you remember anything about
 5 that training?
 6 A. I mean, I remember -- I mean, I
 7 just remember how to investigate it.
 8 Other than that, I mean, I don't know what
 9 specifically you want me to remember.
 10 Q. Do you remember where it was or
 11 what the deposition was --
 12 A. Oh, no, no. The only school I
 13 remember where it was was the homicide
 14 school, which was in Pigeon Forge.
 15 Q. Okay, great.
 16 I don't know where that is, but I
 17 will look forward to figuring that out.
 18 Did there come a time when you came to
 19 learn that a woman named Megan Rondini was
 20 making allegations that she had been
 21 sexually assaulted by a man named
 22 T. J. Bunn?
 23 A. I knew that someone was making

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1 allegations. When I got called I just was
 2 told to respond to the scene.
 3 Q. Okay.
 4 A. We're not told who's making the
 5 allegations or anything like that and
 6 honestly I didn't even know who the -- you
 7 know, who the people were at the scene,
 8 so.
 9 Q. Okay. Can you tell me what that
 10 initial telephone call or the radio call,
 11 whatever it was, will you tell me what
 12 that call was?
 13 A. I believe I was on my way into
 14 work and I was just -- we had what they
 15 call Southern LINC's, like a walkie-talkie
 16 thing, and was just told to respond to
 17 this particular address I believe in
 18 Cottondale and on a -- probably said an
 19 alleged sexual assault, but that's
 20 probably all I remember.
 21 Q. Do you remember whether the name
 22 of either the alleged perpetrator or the
 23 alleged victim were used on that initial

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1 call?

2 A. No, no, no.

3 Q. And what was the -- what were the

4 instructions you were given?

5 A. I was just told to respond to the

6 scene and there was a sergeant on the

7 scene, and basically he told me what to do

8 from that point.

9 Q. Okay. Well, that's my next

10 question. When you got there who do you

11 remember was at the scene?

12 A. There was Sergeant Jeremy Franks,

13 Investigator Adam Jones, and Investigator

14 Josh Hastings.

15 Q. And when you arrived at the scene

16 did someone brief you on what was

17 happening?

18 A. I'm sure they did. Honestly, I

19 couldn't -- I mean, yeah, I'm sure they

20 did.

21 There was some kind of allegations

22 but that's, you know, all I know. I mean

23 -- let me, and I'm sure you know this, but

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1 typically when we respond to a call like

2 that, if we're not the primary team, then

3 we're just -- we're there to assist them

4 in any way we can, okay. So that's kind

5 of what I was there for.

6 Q. Okay. I understand you weren't

7 the primary. Who was the primary?

8 A. I believe Adam and Josh were the

9 primary --

10 Q. Did you know that at the time or

11 have you now come to know that?

12 A. No, no, I knew that at the time.

13 I believe they were partners at the time.

14 I believe, but I'm not sure.

15 Q. So I understand you were there to

16 assist, but did someone tell you sort of,

17 hey, here's what's happening when you

18 arrived?

19 A. Yeah, Sergeant Franks did, yeah.

20 Q. And do you remember what Sergeant

21 Franks told you?

22 A. No, not really. He just said that

23 -- he just kind of told me I guess kind of

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1 a little synopsis that the -- let me see,

2 that there was a girl involved and she had

3 accused this guy of sexually assaulting

4 her at the residence there, and that the

5 guy was still there along with another guy

6 and that's pretty much what I knew.

7 Q. And did he tell you that the guy

8 was named T. J. Bunn?

9 A. I don't think he told me that. It

10 really wouldn't have mattered what he

11 would have told me because I didn't know

12 T. J. Bunn, so.

13 Q. Had you heard of the Bunn family

14 before?

15 A. I've heard of the Bunn family, but

16 I didn't -- you know, I guess I didn't put

17 two and two together with it, and it

18 didn't really matter honestly, so.

19 Q. So when you got there had you read

20 the police report, or the incident report

21 is what you guys call it or the offense

22 report.

23 I'm sorry, it's the incident

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1 offense report. Had you read an incident

2 or offense report related to the

3 allegations before you got there?

4 A. No.

5 Q. Did you talk to anybody about the

6 allegations on the way to the scene?

7 A. No.

8 Q. Do you remember what time you got

9 there?

10 A. No.

11 Q. Okay. I can tell you from looking

12 at documents that it was at 7:50 in the

13 morning. Does that sound about right?

14 A. If you say so. I honestly

15 couldn't tell you.

16 Q. Do you have any reason to think

17 that's wrong?

18 A. No, not at all.

19 Q. Okay. When you got there did

20 anybody at the scene -- Sergeant Franks

21 you said is the person you were talking

22 to.

23 Did he tell you that T. J. Bunn or

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1 that the accused perpetrator had first
 2 lied to Investigator Hastings when
 3 Investigator Hastings asked him if anyone
 4 had been with him the night before?
 5 A. No.
 6 Q. Did Sergeant Franks -- did you
 7 ever come to learn that?
 8 A. Actually, no. That's the first
 9 time I've heard that.
 10 Q. Did you ever learn that while
 11 Investigator Hastings was talking to
 12 Mr. Bunn, he closed a window that sort of
 13 had been opened by Megan Rondini?
 14 A. No.
 15 Q. Did you know at the time after you
 16 had arrived there, in fact, Investigator
 17 Jones and Hastings had been there and
 18 talked to Mr. Bunn, left the scene, and
 19 then come back?
 20 A. No, I don't think I knew that.
 21 Q. So do you remember did Sergeant
 22 Franks tell you what to do to assist once
 23 you got there?

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1 A. Yes, yes, he did.
 2 Q. What did he tell you to do?
 3 A. He told me to take an audio
 4 interview of Mr. Bunn and the other
 5 gentleman, whatever his name is.
 6 Q. Does the name Barksdale ring a
 7 bell?
 8 A. Yes.
 9 Q. Did you do that right away?
 10 A. I did. I put each one of them in
 11 my car, you know, separately, of course,
 12 and did an audio interview with them.
 13 Q. At the time you had that
 14 meeting -- let's focus on just Mr. Bunn.
 15 At the time you had that first
 16 interview with Mr. Bunn, did you know that
 17 Hastings had already spoken to him?
 18 A. No, I don't believe so.
 19 Q. Is it unusual for a new
 20 investigator to take over interviewing an
 21 alleged perpetrator or was that something
 22 that had happened before?
 23 A. Well, I wouldn't say -- I mean,

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1 when you say new investigator, I mean like
 2 I said, we came to assist.
 3 If Investigator Hastings is doing
 4 something else or Investigator Jones is
 5 doing something else, then somebody else
 6 will do the initial thing.
 7 And I'll be perfectly honest with
 8 you, I didn't even remember interviewing
 9 Mr. Bunn until way later, so.
 10 I remembered Mr. Barksdale. I
 11 remember interviewing him but that's
 12 pretty much the extent of it, so.
 13 Q. What happened to cause you to
 14 remember that you interviewed Mr. Bunn?
 15 A. Apparently something was being
 16 played on the radio, I guess the interview
 17 that I did with him, the audio interview.
 18 And some of the guys called and
 19 said you're on the radio. And I said for
 20 what. And they said you're interviewing
 21 T. J. Bunn. I said I didn't interview
 22 T. J. Bunn.
 23 And they said well, you're on the

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1 radio, this is your voice, and I promise
 2 you you're interviewing him, so that's how
 3 I come to remember I interviewed him, so.
 4 Q. Okay.
 5 A. So.
 6 Q. That's a little otherworldly.
 7 Before you interviewed Mr. Bunn did you go
 8 into the Bunn residence?
 9 A. Not at that time, no.
 10 Q. Okay. Well, perhaps you have
 11 already answered this question, but what
 12 do you remember about your interview with
 13 Bunn?
 14 A. I can tell you what -- I can tell
 15 you what I think he said, but, you know, I
 16 honestly couldn't tell you -- I mean, I
 17 can tell you what I remember about the
 18 case and I can't tell you for sure if
 19 that's what Mr. Bunn told me -- it's
 20 either Mr. Bunn and Mr. Barksdale, which
 21 both of their stories were pretty similar
 22 to me, so.
 23 Q. Okay. Well, what can you remember

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1 then about what you know about the case?
2 A. I remember they said that they
3 were at a bar and they left the bar. I
4 don't remember which bar.

5 And they saw a girl walking. And
6 they asked her if she needed a ride, and
7 they were going to give her a ride home.

8 And she said -- she said yes, I
9 guess. And so she gets in the vehicle
10 with them. They take her to her house or
11 to her apartment, and then she wants to go
12 with them.

13 And they ended up taking her to
14 the house. I remember -- I think they
15 said that Mr. -- I believe Mr. Bunn said
16 he had sex with her and then he passed
17 out, and after that that's pretty much it.

18 And Mr. Barksdale, of course, he
19 didn't know that part. All he knew was
20 that -- he told the same story, except him
21 -- you know, he went into his room and
22 went to bed and Mr. Bunn and the girl went
23 into another room.

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1 Q. Okay. When you interviewed
2 Mr. Bunn -- well, I guess what's your
3 normal process for interviewing -- what
4 was your normal process for interviewing
5 the witness? Do you wear a recorder? Do
6 you take notes? What was your normal
7 process?

8 A. Well, we had a voice recorder
9 then. I mean, normally we'll take them to
10 the office where we can do an audio and
11 video of it, which I'm assuming was done.

12 I don't know that for sure, but
13 I'm assuming it was. I didn't do it, but
14 that's typically -- and then sometimes
15 we'll do one on the scene, but we try to
16 audio, you know, do an audio of it, so,
17 you know, we have some kind of record of
18 it.

19 Q. And you say you typically take
20 them to the police office. Is that on the
21 day of the alleged offense?

22 A. Usually, yes.

23 Q. I'm going to ask Nancy to hand

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1 you, it's BB, and you were right, you
2 should have marked it, Nancy, I'm sorry,
3 so this will be Exhibit 43. And it's
4 what's BB in the file, Nancy.

5 COURT REPORTER: Okay.
6 (Whereupon, a document was marked
7 as Defendant's Exhibit No. 43 and
8 is attached to the original
9 transcript.)

10 MS. BOLGER: And while the
11 witness takes a look at it and anybody
12 else in the room who wants to, for the
13 record this is a document which was
14 produced in the wrongful death lawsuit
15 involving Rondini and the Tuscaloosa
16 Sheriff's Office and other individuals.

17 And the cover page describes
18 this as the police interview of
19 T. J. Bunn, Jr., done on July 2nd, 2015,
20 at 8:37 a.m.

21 Joel and Bob, are you guys
22 with me?

23 MR. DILLARD: I am so far.

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1 Thank you, Kate.

2 MR. COCKRELL: Me, too.

3 Q. (By Ms. Bolger) Great. So,
4 Mr. Carroll, I'm just going to ask you to
5 take a look at and answer the simple
6 question, which is is this a transcript of
7 your interview with T. J. Bunn on the
8 morning of July 2nd?

9 A. Okay, okay.

10 She's muted.

11 Q. Sorry, I was muted.

12 Is that the transcript of your
13 interview with Mr. Bunn?

14 A. I guess so.

15 Q. Okay.

16 A. If you tell me it is, it is.

17 Q. Do you have any reason to doubt
18 it?

19 A. No.

20 Q. Okay. If you will turn to the
21 second page of the exhibit, which actually
22 has a number two on the upper right-hand
23 corner.

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1 A. Okay.

2 Q. The first sentence that you speak

3 is officer, this is continuing the

4 conversation with Terry Bunn.

5 Do you see that?

6 A. I do.

7 Q. Okay. Do you remember what the

8 first part of the conversation was with

9 Terry Bunn?

10 A. I have no idea. I didn't remember

11 saying that, so no, I couldn't tell you.

12 Q. Okay. As you sit here do you know

13 whether it was a substantive conversation

14 with Mr. Bunn?

15 A. I would think not, no. I mean, we

16 try to put everything that's related to

17 the case or anything like that on audio,

18 but I honestly -- and I didn't remember

19 that.

20 So I didn't remember talking to

21 him before he got in the car, and I

22 honestly didn't remember talking to him

23 after I left there apparently, so.

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1 Q. Okay. I can only ask what you

2 remember.

3 Okay. If you turn to page 4 of

4 the exhibit, the top of page 4 he's in the

5 middle of describing the night to you, and

6 the last sentence of the paragraph reads,

7 and after I went to sleep apparently she

8 decided to take my money and take my car

9 key and leave.

10 Do you see that?

11 A. I do see that.

12 Q. Before he told you that, had

13 anybody, Sergeant Franks or anybody else,

14 told you that Mr. Bunn was saying that

15 Ms. Rondini stole his money or his keys?

16 A. Not that I remember. If they did,

17 I honestly don't remember.

18 Q. And do you remember following up

19 on this at all?

20 A. I didn't follow up on it, no.

21 Q. Do you remember telling someone

22 that he said that?

23 A. Now, I could have done that. But

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1 I don't remember it to be perfectly

2 honest.

3 Q. As far as I look at the record,

4 and I could be wrong, this seems to be the

5 first time Mr. Bunn said that. I wondered

6 if that was consistent with your memory.

7 A. Well, I mean honestly, I don't

8 remember. Like I said, and I'm sure I

9 probably would have, but I honestly

10 couldn't tell you that I did or that I

11 didn't, so.

12 Q. Okay. Will you turn to page 6?

13 So Mr. Bunn says, right, and looking here

14 at the phone, just trying to look and to

15 see if I called anybody around that time

16 and to give you a specific time,

17 apparently I did not use my phone that

18 late at night, but.

19 Do you see that?

20 A. I do.

21 Q. Did you ever ask to see Mr. Bunn's

22 phone?

23 A. I didn't, no.

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1 Q. Did you ever recommend that

2 anybody see Mr. Bunn's phone?

3 A. That's something that one of the

4 lead investigators would have done and

5 that's pretty standard procedure for us at

6 that time to get their phone or to ask to

7 see their phone.

8 But now whether they did or not, I

9 mean, I'm assuming that they did, but

10 that's just an assumption on my part.

11 Q. Would you have done it?

12 A. I would have -- yes, I would have

13 done it, but.

14 Q. Okay. Did you consider

15 Mirandizing Mr. Bunn before you

16 interviewed him?

17 A. I'm sure I did, and I want to say

18 I may have talked to Sergeant Franks, but

19 I'm not absolutely certain on that because

20 typically that's what, you know, we would

21 normally do that.

22 But then again sometimes when we

23 really don't know what the story is, we'll

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1 just ask them to tell us what the story is
2 because at that time -- at that point
3 sometimes you don't know if you have a
4 suspect or not or a defendant or not, so
5 you're just trying to figure out exactly
6 what happened.

7 Q. Okay. Well, I mean in this case
8 Ms. Rondini was making allegations that
9 she was sexually assaulted; right?

10 A. Well, she was to someone. She
11 wasn't to me.

12 Q. I don't think I understand what
13 you mean.

14 A. She apparently made allegations to
15 someone, but I didn't have knowledge of
16 what she was telling other people at that
17 time.

18 Q. So you felt like you didn't have
19 the information to help you make that
20 decision?

21 A. That's correct, yes.

22 Q. I noticed in this transcript, and
23 you're welcome to look, that you never

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1 actually asked him specific questions
2 about the fact that Ms. Rondini said she
3 was sexually assaulted. You just asked
4 him open-ended questions about what
5 happened?

6 A. Correct.

7 Q. Was that a strategy decision that
8 you made?

9 A. No, that's just -- I mean, I was
10 just trying to find out what his side of
11 the story was.

12 Q. Why?

13 A. So I would know what his side of
14 the story would be, I mean.

15 Q. Right. Wait, no, I get that. In
16 the course of an investigation does there
17 come a time when you would choose to put
18 the allegations -- to cross-examine the
19 alleged perpetrator?

20 A. Sure, sure, but at that time if I
21 were going to do that, then I would
22 definitely need to -- if I'm going to
23 interrogate, I need to read him Miranda,

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1 and that's something that would be left up
2 to the investigator who's actually the
3 lead or the one who's working the case.
4 Q. Okay. I'm going to ask Nancy to
5 show you Exhibit 2 in this case, which is
6 the felony packet in this matter.

7 (Whereupon, a document that was
8 previously marked as Defendant's
9 Exhibit No. 2 was referenced and
10 is attached to the original
11 transcript.)

12 Q. I'm not going to ask you to read
13 the whole thing. I'm actually going to
14 point you to specific pages, but if you
15 want to acquaint yourself with the
16 document, of course, you should feel free,
17 but I wondered if you had ever seen this
18 before?

19 A. No.

20 Q. So you weren't involved in putting
21 together this felony packet?

22 A. No, no, I was not.

23 Q. Okay, terrific. Now, you're

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1 really going to want to throw something at
2 me, but I'm actually going to ask you to
3 look at your handwritten notes which are
4 on the 20th page of this document.

5 MR. DILLARD: Help me out,
6 Kate. I'm getting there, or do you want
7 me to count them as we go or can you give
8 me a little idea of what they look like?

9 MS. BOLGER: It's literally
10 handwritten notes. So you're going to go
11 past the initial incident report and past
12 T. J.'s Miranda -- or Megan's Miranda
13 warning and her written statement and her
14 handwritten notes and it's three pages
15 after Megan's handwritten statement.

16 MR. DILLARD: What's at the
17 top of the page?

18 MS. BOLGER: It's literally
19 Mr. Carroll's handwriting and it says
20 7/2/15 08:37 Carroll in handwriting.

21 MR. DILLARD: Okay. Hold
22 on. I haven't found that yet.

23 Q. (By Ms. Bolger) Are you with me,

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1 Mr. Carroll?

2 A. Yes, I've got it.

3 MR. DILLARD: Just a moment,

4 Kate. Bob's trying to help me find it but

5 I'm not there yet.

6 I guess I'm going to have to

7 count them. Just give me a minute please.

8 I'm at ten, so I'm halfway there. Hold on

9 just a minute.

10 I must not have a complete

11 42. Let me take your 42, Nancy that you

12 were trying to hand me.

13 COURT REPORTER: It's Number

14 2. It was Number 2.

15 MR. DILLARD: It's Number 2,

16 not Number 42. I'm sorry.

17 (Off the record.)

18 MR. DILLARD: Just a moment,

19 Kate, I'm about to get in at least the

20 right document.

21 MS. BOLGER: That's all

22 right, Joel. Sorry.

23 MR. DILLARD: Yes, ma'am, I

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1 have found it. Thank you.

2 Q. (By Ms. Bolger) Okay, fantastic.

3 Mr. Carroll, I'm going to point

4 you to the 20th page of Exhibit 2, and

5 I've characterized it as your handwritten

6 notes, but I was wrong to do that. I

7 should have asked you are these -- is this

8 your handwriting?

9 A. It is.

10 Q. And are these your handwritten

11 notes of Mr. Bunn that we just discussed?

12 A. I believe so, yes.

13 Q. And actually if you review it, it

14 actually -- strangely, it's the 20th page

15 and then it skips over to the 22nd page of

16 the exhibit, there's one stray page. Am I

17 correct?

18 A. Yes.

19 Q. And if you read those notes in

20 substance, they're similar to the

21 transcript we just looked at; right?

22 A. Right, yes.

23 Q. Okay. And if you see at the top

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1 of the handwritten notes, it starts out by

2 you saying gave consent to search and

3 signed form. Do you see that?

4 A. Right, I do.

5 Q. And then it starts says brought

6 somebody back to the residence; right?

7 A. Right, yes.

8 Q. Do you remember having a

9 conversation with Mr. Bunn other than what

10 is reflected in these notes?

11 A. The only -- yeah, Sergeant Franks

12 asked me to get them to -- get him to sign

13 a consent form to search his residence,

14 and I guess the property.

15 And a lot of times just depending

16 on who might have had a form, you know, I

17 guess I did, so.

18 Q. Okay.

19 A. I do remember that part, yeah. I

20 had forgotten it, but I remember it now.

21 Q. During your discussions with

22 Mr. Bunn, did you confront him about the

23 fact that he had lied to Hastings about

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1 having someone at his house the night

2 before?

3 A. I honestly don't remember that,

4 no. And I honestly don't remember that at

5 all, that he had lied to Josh for any

6 reason, so.

7 Q. So you don't remember knowing that

8 he lied to Josh?

9 A. No, I do not. I do not remember

10 that.

11 Q. So as a consequence, you probably

12 couldn't have confronted him with that

13 lie; correct?

14 A. That's correct.

15 Q. And there's nothing in this

16 interview that reflects that you

17 confronted him with that lie; right?

18 A. No, no, there's not.

19 Q. So other than what's reflected in

20 this, in these handwritten notes and the

21 fact that you know you asked him for

22 consent to search, do you remember having

23 any other substantive conversations with

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1 T. J. Bunn about Megan Rondini?
 2 A. No, not at all.
 3 Q. You also took a statement from
 4 Jason Barksdale; correct?
 5 A. Correct.
 6 Q. And how did that come to be?
 7 A. Because he was at the scene. I
 8 mean, he was -- he was I guess part of it
 9 because he was, you know, he was with
 10 Mr. Bunn when he picked up Ms. Rondini.
 11 Q. Okay. And Sergeant Franks asked
 12 you to interview him; correct?
 13 A. That's correct, yes, that's
 14 correct.
 15 Q. Okay. And so you said you
 16 interviewed Mr. Bunn you think in your
 17 car; right?
 18 A. Yeah, I did.
 19 Q. And then after you're done with
 20 Mr. Bunn, he left your car and then did
 21 you go get Mr. Barksdale?
 22 A. No, I think he was probably --
 23 they were outside because at that time I

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1 don't think they were allowing any of them
 2 inside, so.
 3 And I don't remember which one I
 4 interviewed first honestly.
 5 Q. Okay. And what do you remember,
 6 if anything, about your interview with
 7 Mr. Barksdale?
 8 A. Very little. Just about, you
 9 know, they were -- he was with Mr. Bunn
 10 and they were at a bar and they left and
 11 saw the girl walking and picked her up and
 12 offered to take her home. They took her
 13 there. She wanted to go with them.
 14 They went to Mr. Bunn's house and
 15 he goes in his bedroom or the bedroom he's
 16 sleeping in, and Mr. Bunn and the girl go
 17 into another bedroom and that's all he can
 18 tell me.
 19 Q. Do you remember having any
 20 impressions of Mr. Bunn?
 21 A. No.
 22 Q. Do you have a memory of having an
 23 impression of his truth telling?

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1 A. No.
 2 Q. Did you believe the guy?
 3 A. At that point, I probably did,
 4 but, you know, I've been around -- I had
 5 been around long enough at that time to
 6 know that, you know, just because somebody
 7 is telling you one thing it doesn't give
 8 you the whole picture, you know.
 9 I hadn't talked -- I had not
 10 talked to her, nor did I ever talk to her,
 11 so, you know, for me to have the complete
 12 picture, I would have had to talk to both
 13 of them, because usually the truth is in
 14 the middle somewhere. It's not, you know
 15 -- the way we've always -- the way I
 16 always see it anyway.
 17 Q. So you need to talk to both sides
 18 before you charge a crime?
 19 A. Absolutely, absolutely. You need
 20 to investigate it before you charge
 21 anybody.
 22 Q. Okay. Do you remember having an
 23 impression of Jason Barksdale?

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1 A. No.
 2 Q. Do you remember whether you
 3 thought he told the truth?
 4 A. They -- all I can tell you is that
 5 their stories were similar and that's all
 6 I remember.
 7 Q. Okay. I'm going to ask Nancy to
 8 hand you document -- Nancy, it's BG, and
 9 I'm going ask her to mark it as Exhibit
 10 44.
 11 (Whereupon, a document was marked
 12 as Defendant's Exhibit No. 44 and
 13 is attached to the original
 14 transcript.)
 15 Q. And for the record, while
 16 Mr. Carroll is reading the document, this
 17 is a document which was actually produced
 18 to us in the wrongful death lawsuit
 19 involving Rondini and the sheriff's
 20 office, and it is a police interview of
 21 Jason Barksdale dated July 2nd, 2015.
 22 And, Mr. Carroll, my question is
 23 going to be very much the same as it was

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1 last time, which is is this a transcript
 2 of your interview with Mr. Barksdale?
 3 A. Yes, ma'am. If you tell me it is.
 4 I never saw it before so I'm assuming so,
 5 yeah.
 6 Q. Okay. Do you have any reason to
 7 believe that it's not?
 8 A. No, no.
 9 Q. Can you turn to the fifth page of
 10 the exhibit? Are you with me?
 11 A. I am.
 12 Q. And you ask at the eighth line did
 13 she come back willingly, and Mr. Barksdale
 14 says yes, 100 percent. And you say did
 15 she want to come back, and he responds
 16 yes, I mean T. J. and then you say whose
 17 idea was it.
 18 Do you see that?
 19 A. I do.
 20 Q. Okay. I noticed here again you
 21 didn't ask Mr. Barksdale about the fact
 22 that Megan was saying she was sexually
 23 assaulted.

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1 You simply asked for his side of
 2 the story. Again, did you make a decision
 3 not to cross-examine him on that question?
 4 A. I think my task at that point and
 5 on these two interviews was just to get
 6 their side of the story.
 7 I wasn't trying to accuse them of
 8 anything because I didn't really know what
 9 the whole story was or what the whole
 10 allegation was or anything else, so, you
 11 know, no, I mean, I'm just doing -- kind
 12 of doing like before, I'm asking kind of
 13 open-ended questions and just getting him
 14 to tell me what he remembers happened
 15 because when alcohol is involved, a lot of
 16 times people don't always remember things
 17 correctly, so, and I'm assuming alcohol
 18 was involved.
 19 Q. Right, yes. Yes, indeed. Okay.
 20 If you'll go back to -- you can
 21 put that exhibit, which is BG, you can put
 22 that exhibit, which is now Exhibit 44, you
 23 can put that aside, and if you'll go back

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1 to Exhibit 2, which is the felony report.
 2 A. Okay.
 3 Q. And if you turn to the second page
 4 of your notes of -- your interview with
 5 Mr. Bunn was page 22.
 6 If you turn to page 28, so six
 7 pages later, and I'll wait for everybody
 8 to get there.
 9 MR. DILLARD: I'm trying.
 10 I'm doing better this time, but I'm not
 11 there yet, so just hold on a moment, Kate.
 12 What's at the top of it?
 13 MS. BOLGER: It's, again,
 14 handwritten notes. It says Carroll 7/2015
 15 0850.
 16 MR. DILLARD: Let me do some
 17 turning here.
 18 MS. BOLGER: Jason
 19 Barksdale.
 20 MR. DILLARD: I'm looking
 21 for that now. I found it.
 22 Q. (By Ms. Bolger) Okay. And,
 23 Mr. Carroll, are you with me?

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1 A. I am.
 2 Q. These are your handwritten notes
 3 that you took at the time; right?
 4 A. Correct.
 5 Q. Other than what's reflected in
 6 these notes on the transcript we just
 7 read, do you remember having any other
 8 conversation with Jason Barksdale about
 9 the allegations made by Megan Rondini?
 10 A. No.
 11 Q. After you finished these two
 12 interviews, did you talk to Jones or
 13 Hastings about their content?
 14 A. I honestly don't remember. I'm
 15 sure I did, but I don't remember.
 16 Q. Do you remember whether you talked
 17 to Sergeant Franks about them?
 18 A. Again, I'm sure I probably did,
 19 but I don't -- I cannot specifically say
 20 yes, I remember that.
 21 Q. Do you remember any conversations
 22 you had with Investigator Jones, for
 23 example, at the Bunn house that morning?

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1 A. No, not at all.
2 Q. Do you remember any conversations
3 you had with Hastings at the Bunn house
4 that morning?
5 A. No.
6 Q. How about Sergeant Franks?
7 A. Other than him asking me to do the
8 interviews and do the consent form, that's
9 pretty much what I remember.
10 Q. Do you remember talking to Captain
11 Hood that morning?
12 A. No, I don't remember talking to
13 Gary at all.
14 Q. How about Captain Hart?
15 A. No. I mean, I could have but --
16 sorry.
17 Q. That's okay. Do you remember
18 going into the Bunn residence?
19 A. Yes.
20 Q. What did you do in the Bunn
21 residence?
22 A. I took video in the Bunn
23 residence. Took video of the house and I

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1 guess the scene, if you want to call it
2 that.
3 Q. Okay. And with whom did you walk
4 around the house to do that video?
5 A. I don't remember walking around
6 the house with anyone.
7 Q. Were you with Investigator
8 Hastings when you were doing that?
9 A. I was walking around by myself. I
10 mean, he may have shown me where the rooms
11 were, but I videoed the entire house to
12 what I remember.
13 Q. Okay. And why were you videoing
14 the entire house?
15 A. Because that's what we do or
16 that's what we did at that time.
17 Q. And what's the purpose of doing
18 it?
19 A. Well, you don't really know -- I
20 mean, you want to make sure you get the
21 complete video and pictures of the whole
22 necessary crime scene or scene itself.
23 You don't know what may be

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1 pertinent or what may be important later
2 so you video it to put it on record.
3 Q. Okay. Was Mr. Bunn in the house
4 when you were walking around the house?
5 A. No.
6 Q. Where was he?
7 A. He was outside to my knowledge.
8 Q. So after you interviewed Bunn and
9 Barksdale and videoed the house, did you
10 do anything else related to the Rondini
11 investigation at the home of T. J. Bunn?
12 A. Not that I remember, no, ma'am.
13 Q. Sergeant Franks didn't ask you to
14 do anything else?
15 A. No.
16 Q. Did you do anything else at all
17 related to the Rondini investigation?
18 A. No, I did not.
19 Q. I have some notes that say that
20 you went to the house of a woman named
21 Rebecca Lundgren and collected Rondini's
22 shirt and shoes.
23 Does that sound right to you?

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1 A. I remember going to an apartment
2 and getting something from somebody, but I
3 honestly couldn't tell you it was tied
4 into the Rondini case, because, you know,
5 we did that -- I do that a lot of times
6 for different ones or be told to go do
7 this.
8 I remember going and getting
9 something from, like I said, from an
10 apartment but I couldn't tell you where
11 the apartment was or if it was
12 specifically for Ms. Rondini.
13 Q. Do you remember any conversation
14 you had with that individual at the time
15 you went to that apartment?
16 A. No.
17 Q. So you never questioned that
18 individual who provided you with the
19 clothes as -- you were never told to
20 question that person as a witness when you
21 collected the shirt and shoes; right?
22 A. No, not to my knowledge, no.
23 Q. Did you ever speak to Megan

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1 Rondini?
2 A. No.
3 Q. Did you ever try to call Megan
4 Rondini?
5 A. No.
6 Q. And you were not responsible for
7 collecting evidence at the scene; right?
8 A. That's correct.
9 Q. Were you involved with the search
10 for Mr. Bunn's wallet at the scene?
11 A. No, I don't believe so.
12 Q. Were you involved in searching the
13 car at the scene?
14 A. No.
15 Q. Were you listening in on any of
16 the interviews with Ms. Rondini that
17 happened at the police station?
18 A. No.
19 Q. How about the interview with
20 Mr. Bunn that happened at the police
21 station?
22 A. No.
23 Q. So other than what we've talked

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1 about, did you have any role in the
2 investigation into Megan Rondini's
3 allegations against T. J. Bunn?
4 A. No.
5 Q. How about Mr. Bunn's allegations
6 against Ms. Rondini, did you have any role
7 in investigating them?
8 A. I don't even know what they were,
9 so no.
10 Q. Well, that's a good question. Are
11 you aware that Ms. Rondini was charged
12 with theft related to the events at
13 Mr. Bunn's house?
14 A. No.
15 Q. Do you know what happened to Megan
16 Rondini?
17 A. Yeah, I heard she had committed
18 suicide.
19 Q. And how did you hear that?
20 A. I mean, I was in the unit and I
21 don't remember when. I just remember that
22 somebody told me that she had, which was a
23 sad thing, so.

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1 Q. And what were people in the unit
2 saying about it?
3 A. They just -- basically, just said
4 that she had committed suicide.
5 Q. And that's it? No one was
6 expressing any reaction or follow-up
7 thoughts to that?
8 A. I mean, I don't remember who told
9 me, and I mean, you know, unfortunately we
10 dealt with that a lot.
11 And no, I don't remember any
12 reaction that anybody had, you know, about
13 that. I mean no one would have been -- no
14 one would have wanted to see that happen
15 regardless of anything, so, and I
16 certainly hate it.
17 Q. You said you dealt with it a lot.
18 I didn't understand what you meant.
19 A. I do what?
20 Q. You said you dealt with that a
21 lot. What do you mean by that?
22 A. We worked in the Homicide Unit, we
23 worked suicides all the time or any kind

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1 of death investigation.
2 Q. Okay. I just didn't understand
3 what you meant.
4 A. Yeah, that's fine.
5 Q. Did you ever talk to Sheriff
6 Abernathy about Ms. Rondini's case?
7 A. Nope.
8 Q. Did you ever talk to either -- did
9 you ever talk to Gary Hood about
10 Ms. Rondini's case?
11 A. If I did, I don't remember talking
12 to him.
13 Q. Did you ever talk to Kip Hart
14 about it?
15 A. Again, I don't remember ever
16 talking to him about it.
17 Q. Did you ever talk to anybody in
18 the district attorney's office about it?
19 A. No.
20 Q. Have you ever talked to Josh
21 Hastings about it?
22 A. No, no.
23 Q. Okay. How about Adam Jones?

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1 A. No.
2 Q. Did you ever speak to a gentleman
3 named Michael Rondini?
4 A. No.
5 Q. Do you know what this lawsuit is
6 about?
7 A. Not really, no.
8 Q. Have you heard that there was an
9 article published about the Rondini
10 investigation by BuzzFeed?
11 A. I did hear that, yes.
12 Q. Have you read it?
13 A. No.
14 Q. What have you heard about it?
15 A. That there was an article
16 published about the Rondini case is all.
17 Q. Have you ever spoken to Adam Jones
18 about the article published about the
19 Rondini case?
20 A. No, I have not.
21 Q. Have you ever -- did someone say
22 something and I missed it? No, okay.
23 Have you ever spoken to Josh

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1 Hastings about the article about the
2 Rondini case?
3 A. No.
4 Q. Have either of those gentlemen
5 ever talked to you about being damaged by
6 an article about the Rondini case?
7 A. No.
8 Q. Has your opinion of Adam Jones
9 changed as a result of an article about
10 the Rondini case?
11 A. No.
12 Q. Has your opinion of Josh Hastings
13 changed as a result of an article about
14 the Rondini case?
15 A. No.
16 MS. BOLGER: Well, I think
17 that's it for me. Unless -- yeah, I think
18 that's it, so thank you so much for
19 coming.
20 That was my quickest
21 deposition. You should be -- you should
22 be pleased to know. That's it for me.
23 Joel and Bob, I don't know

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1 if you have anything you want to follow
2 up.
3 MR. COCKRELL: No, no
4 questions.
5 MR. DILLARD: No, thank you.
6 VIDEOGRAPHER: We're off the
7 record at 12:55 p.m.
8
9 [The deposition was concluded at
10 12:55 p.m., and further deponent saith
11 not.]
12
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1 CERTIFICATE
2 STATE OF ALABAMA)
3 TUSCALOOSA COUNTY)
4 I hereby certify that the above and
5 foregoing proceedings were taken down by
6 me in stenotype, and the questions and
7 answers thereto were reduced in transcript
8 form by computer-aided transcript under my
9 supervision, and that the foregoing
10 represents a true and correct transcript
11 of the proceedings occurring on said date
12 at said time.
13 I further certify that I am neither
14 of counsel nor of kin to the parties to
15 the action, nor am I anyway interested in
16 the results of said cause.
17 Signed January 19, 2021.
18
19 /s/ Nancy Pannell, CCR
20 NANCY PANNELL, CCR
21 Alabama CCR No. 30, Expires 9/30/2021
22 Commissioner for the State of Alabama at
23 Large, Commission expires 07/17/2021

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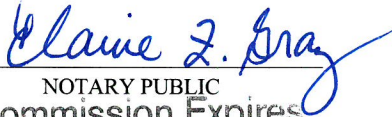
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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA WESTERN DIVISION	1 TERRY CARROLL 2 INSTRUCTIONS TO THE WITNESS 3 4
CASE NUMBER 7:19-cv-00403-RDP	5 Please read your deposition 6 over carefully before you sign it. You 7 should make all your changes on the 8 attached errata sheet.
ADAM JONES and JOSHUA HASTINGS, Plaintiff(s), vs. BUZZFEED, INC., BUZZFEED NEWS, BEN SMITH, and KATIE J.M. BAKER, Defendant(s).	9 After making any changes 10 which you have noted on the attached 11 errata sheet, sign your name on the 12 Deponent's Certificate and date it. You 13 are signing it subject to the changes you 14 have made on the errata sheet, which will 15 be attached to the deposition.
VIDEO AND ZOOM DEPOSITION TESTIMONY OF: TERRY CARROLL	16 Return the attached errata 17 sheet and Deponent's Certificate to 18 Birmingham Reporting, 3710 4th Avenue 19 South, Birmingham, Alabama 35222.
JANUARY 19, 2021 12:02 p.m. COURT REPORTER: NANCY W. PANNELL, CCR The reading and signing of this deposition has NOT been waived	20 According to the Rules of 21 Civil Procedure, you will have thirty (30) 22 days from the date you receive this 23 deposition in which to read it, sign it, and return the errata sheet and Deponent's
Page 3	Page 4
1 Certificate to the above office. If you 2 fail to do so, you automatically waive 3 your right to make any corrections to your 4 deposition. 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	1 ERRATA SHEET 2 PAGE LINE EXPLANATION 3 _____ 4 _____ 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 _____ 21 _____ 22 _____ 23 _____

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BIRMINGHAM REPORTING SERVICE
(205) 326-4444

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<p>1 DEPONENT'S CERTIFICATE</p> <p>2</p> <p>3 I, TERRY CARROLL, the</p> <p>4 witness herein, have read the transcript</p> <p>5 of my testimony and the same is true and</p> <p>6 correct, to the best of my knowledge. Any</p> <p>7 corrections and/or additions, if any, are</p> <p>8 listed separately.</p> <p>9 </p> <p>10 TERRY CARROLL</p> <p>11 <u>2-3-21</u></p> <p>12 DATE</p> <p>13</p> <p>14 Sworn to and subscribed</p> <p>15 before me, this the <u>3rd</u> day of</p> <p>16 <u>Feb.</u>, 2021, to certify my hand</p> <p>17 and seal of office.</p> <p>18</p> <p>19 </p> <p>20 NOTARY PUBLIC</p> <p>21 My Commission Expires</p> <p>22 January 1, 2023</p>	<p>1 STIPULATION</p> <p>2 IT IS STIPULATED AND AGREED</p> <p>3 by and between the parties through their</p> <p>4 respective counsel that the VIDEO AND ZOOM</p> <p>5 DEPOSITION of TERRY CARROLL may be taken</p> <p>6 before Nancy W. Pannell, Certified</p> <p>7 Shorthand Reporter and Notary Public,</p> <p>8 State at Large, at the offices of</p> <p>9 Birmingham Reporting Service, WorkSouth</p> <p>10 Tuscaloosa, 1490 Northbank Parkway, Suite</p> <p>11 200, Conference Room 252, Tuscaloosa,</p> <p>12 Alabama, on JANUARY 19, 2021, commencing</p> <p>13 at approximately 12:02 p.m.</p> <p>14 IT IS FURTHER STIPULATED AND</p> <p>15 AGREED that the signature to and the</p> <p>16 reading of the deposition by the witness</p> <p>17 IS NOT waived, the deposition to have the</p> <p>18 same force and effect as if full</p> <p>19 compliance had been had with all laws and</p> <p>20 rules of Court relating to the taking of</p> <p>21 depositions.</p> <p>22 IT IS FURTHER STIPULATED AND</p> <p>23 AGREED that it shall not be necessary for</p>
<p>Page 7</p> <p>1 any objections to be made by counsel to</p> <p>2 any questions, except as to form or</p> <p>3 leading questions, and that counsel for</p> <p>4 the parties may make objections and assign</p> <p>5 grounds at the time of trial or at the</p> <p>6 time said deposition is offered in</p> <p>7 evidence, or prior thereto.</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p>Page 8</p> <p>1 INDEX</p> <p>2</p> <p>3 EXAMINATION BY: PAGE NO.</p> <p>4 MS. BOLGER 13</p> <p>5 CERTIFICATE 68</p> <p>6</p> <p>7</p> <p>8 INDEX OF EXHIBITS</p> <p>9</p> <p>10 PREVIOUSLY MARKED DEFENDANT'S EXHIBITS</p> <p>11 REFERENCED AND ATTACHED</p> <p>12 2 Homicide Unity Felony 43</p> <p>13 Packet</p> <p>14 16 Timeline of Rondini Case, 19</p> <p>15 Page 1-146</p> <p>16</p> <p>17</p> <p>18 DEFENDANT'S EXHIBITS: PAGE NO.</p> <p>19 43 Police Interview of TJ Bunn 35</p> <p>20 44 Police Interview of Jason 52</p> <p>21 Barksdale</p> <p>22</p> <p>23</p>

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